

SEYFARTH SHAW LLP
M. Ryan Pinkston (SBN 310971)
rpinkston@seyfarth.com
560 Mission Street, Suite 3100
San Francisco, California 94105
Telephone: (415) 397-2823
Facsimile: (415) 397-8549

***Attorneys for
Turner Construction Company***

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☒ Affects Pacific Gas and Electric Company
☐ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)

(Jointly Administered)

**TURNER CONSTRUCTION COMPANY'S
NOTICE OF PERFECTION OF LIEN
PURSUANT TO 11 U.S.C. § 546(b)**

1 Pursuant to 11 U.S.C. §§ 362(b)(3) and 546(b), Turner Construction Company (“Turner”) hereby
2 gives notice of its perfection of, maintenance and continuation of perfection of, and intention to enforce
3 to the fullest extent permitted by applicable law, *see, e.g.*, California Civil Code § 8400 *et seq.*, Turner’s
4 duly recorded mechanic’s lien for labor, equipment, material, and services provided by Turner to Pacific
5 Gas and Electric Company, as more fully described in the attached **Exhibit A**. *See Village Nurseries v.*
6 *Gould (In re Baldwin Builders)*, 232 B.R. 406 (B.A.P. 9th Cir. 1999); *Village Nurseries v. Greenbaum*,
7 101 Cal. App. 4th 26 (2002). This notice is in addition to, and not in lieu of, Turner’s right and intention
8 to enforce its lien to the fullest extent permitted by law. Turner reserves all rights.

9
10 DATED: July 22, 2020

SEYFARTH SHAW LLP

11 By: /s/ M. Ryan Pinkston
M. Ryan Pinkston

12 *Attorneys for Turner Construction Company*

13 56430669v.1
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT A

RECORDING REQUESTED BY
Randall Creech, Esq.
WHEN RECORDED MAIL TO

Randal C. Creech, Esq.
O'HARA ♦ CREECH LLP
255 W. Julian Street, Ste. 402
San Jose, CA 95110

2020-044680

3:00 pm 05/15/20 MLL Fee: 95.00

Count of Pages 2

Recorded in Official Records

County of San Mateo

Mark Church

Assessor-County Clerk-Recorder



* \$ R 0 0 0 2 8 5 7 7 2 6 \$ *

SPACE ABOVE THIS LINE FOR RECORDER'S USE ONLY

Mechanics' Lien (Claim of Lien)

(To be recorded in the county recorder's office in the county in which the property is located.)

NOTICE IS HEREBY GIVEN: That Turner Construction Company as claimant claims a lien for labor, service, equipment, or materials under Section 8000 et Seq. of the Civil Code of the State of California, upon the premises hereinafter described, and upon every estate or interest in such structures, improvements and premises held by any party holding any estate therein.

Said labor, service, equipment or materials were furnished for the construction of those certain buildings, improvements, or structures, now upon that certain parcel of land situated in the County of San Mateo State of California, said land described as follows:

STREET ADDRESS: 3150 Geneva Avenue, Brisbane, California 94005

LEGAL DESCRIPTION: 135-41-28B-3

Said lien is claimed for the following labor, services, equipment or materials: (describe labor, services, equipment, or materials in detail) General contractor providing labor and materials in connection with EER Warehouse

Amount due after deducting all just credits and offsets...\$ 883,460.16

Lien amounts do not include legal fees, interest or administrative fees associated with bankruptcy.

Compensation will be collected in accordance with applicable laws and contract terms and provisions.

The name of the person or company by whom claimant was employed or to whom claimant furnished labor, services, equipment, or materials is: Pacific Gas and Electric Company

That Pacific Gas and Electric Company, 77 Beale Street, 32nd Floor, San Francisco, CA 94105

is/are the reputed owner(s) of said building and/or premises, or some interest therein.

DATED: 3/30/20 Name of Claimant: Turner Construction Company

By: [Signature]
(Firm Name)

Vice President & Officer of the Company
(Signature)
(Authorized Capacity)

VERIFICATION

I, the undersigned, certify that I am the authorized agent of the claimant named in the foregoing Mechanics' Lien, and that I am informed and believe the facts herein to be true, and, on that ground, allege that the facts stated in the foregoing Mechanics' Lien are true.

I certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on May 11, 2020, in the City of San Jose, State of California

[Signature]

Its Agent

NOTICE OF MECHANICS LIEN ATTENTION!

Upon the recording of the enclosed MECHANICS LIEN with the county recorder's office of the county where the property is located, your property is subject to the filing of a legal action seeking a court-ordered foreclosure sale of the real property on which the lien has been recorded. That legal action must be filed with the court no later than 90 days after the date the mechanics lien is recorded.

The party identified in the mechanics lien may have provided labor or materials for improvements to your property and may not have been paid for these items. You are receiving this notice because it is a required step in filing a mechanics lien foreclosure action against your property. The foreclosure action will seek a sale of your property in order to pay for unpaid labor, materials, or improvements provided to your property. This may affect your ability to borrow against, refinance, or sell the property until the mechanics lien is released.

BECAUSE THE LIEN AFFECTS YOUR PROPERTY, YOU MAY WISH TO SPEAK WITH YOUR CONTRACTOR IMMEDIATELY, OR CONTACT AN ATTORNEY, OR FOR MORE INFORMATION ON MECHANICS LIENS GO TO THE CONTRACTORS' STATE LICENSE BOARD WEB SITE AT www.cslb.ca.gov.

PROOF OF SERVICE AFFIDAVIT California Civil Code section 8416(a)(7) and (c)

AFFIDAVIT FOR SERVICE ON THE OWNER

California Civil Code Section 8416 (a)(7) and (c)(1)

I, Lorie Salaices (name), declare that I served a copy of this Mechanics' Lien and Notice of Mechanics' Lien by registered mail, certified mail, or first-class mail, evidenced by a certificate of mailing, postage prepaid, addressed to the owner(s) or reputed owner(s) of the property:

Name and title of person or entity served: Pacific Gas & Electric Company

Service Address: 77 Beale Street, 32nd Floor, San Francisco, CA 94105

Said service address is the owner's residence, place of business, or address shown by the building permit on file with the permitting authority for the work.

Executed on May 11, 2020, at San Jose, CA.

By: 